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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	DOCKET FILE COPY ORIGINAL
Access Charge Reform) CC Docket No. 96-262
Price Cap Performance Review for Local Exchange Carriers) CC Docket No. 94-1
Transport Rate Structure and Pricing) CC Docket No. 91-213
Usage of the Public Switched Network by Information Service and Internet Access Providers) CC Docket No. 96-263

COMMENTS OF
AMERICAN LIBRARY ASSOCIATION
ON NOTICE OF PROPOSED RULEMAKING AND NOTICE
December 23, 1996

The American Library Association (ALA) respectfully submits its comments on the above referenced proceeding regarding Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, and Usage of the Public Switched Network by Information Service and Internet Access Providers. The American Library Association, founded in 1876, is the oldest and largest library association in the world. With a membership of more than 57,000 librarians, library trustees, library educators, friends of libraries, and other interested persons from every state, ALA is the chief advocate for the people of the United States in their search for the highest quality of library and information services and ALA's concerns span all types of libraries: state, public, school, academic, and special libraries. ALA files these comments because of the impact that access fees may have on interstate information services which are critical to the mission of libraries and the communities they serve.

ALA concurs with the tentative conclusion of the Commission in paragraph 283 of the NPRM that the existing pricing structure for information services should remain in place at this time. As was noted in paragraph 288, if the existing access charge system includes non-cost-based rates and inefficient rate structures, this regime should not be extended to an additional class of users. The extension of such a regime could add additional economic barriers to the provision of information services to the communities that libraries serve by potentially adding to the cost of information services which libraries purchase and reducing the pool of potential providers because of economic disincentives.

In 1993, over 40% of public library systems had annual operating expenditures of less that \$50,000, and over 54% of public library systems had annual operating expenditures of less than \$100,000. Only 9.6% of library systems had annual operating expenditures in excess of

\$1,000,000.¹ Yet public libraries in the United States collectively spend approximately \$11.3 million annually on online database services annually and libraries of all types, including academic libraries, spend about \$39.3 million.²

ALA plans to file additional information with regard to the Notice of Inquiry on Implications of Information Service and Internet Usage and offers its assistance in these efforts.

Respectfully submitted, AMERICAN LIBRARY ASSOCIATION

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January 27, 1997

¹National Center for Education Statistics, *Public Libraries in the United States: 1993*, p. 70 (September, 1995)

²Library Acquisition Expenditures, 1994-9995: U.S. Public, Academic, Special, and Government Libraries in The Bowker Annual Library and Book Trade Almanac 453 (41st ed. 1996).

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